

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

CALEDONIAN BANK LTD.,  
CALEDONIAN SECURITIES LTD.,  
CLEAR WATER SECURITIES, INC.,  
LEGACY GLOBAL MARKETS S.A., and  
VERDMONT CAPITAL, S.A.

Defendants.

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: Case No. 15-cv-894  
: (WHP)(JLC)

**NOTICE OF MOTION BY BRIDGET M. FITZPATRICK  
FOR ADMISSION PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Bridget M. Fitzpatrick, hereby move this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Plaintiff in the above-captioned action.

I am in good standing of the bars of the District of Columbia and the State of California (inactive) and there are no pending disciplinary proceedings against me in any state or federal court. Certificates of Good Standing, as well as a proposed Order, are being submitted herewith.

Dated: Washington, D.C.  
January 13, 2016

Local Counsel:

David Stoelting  
Securities and Exchange Commission  
Brookfield Place, 200 Vesey Street  
New York, New York 20181  
(212) 336-0174 telephone  
(212) 336-1323 facsimile  
[stoeltingd@sec.gov](mailto:stoeltingd@sec.gov)

Respectfully submitted,

/s/ Bridget M. Fitzpatrick  
Bridget M. Fitzpatrick  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-5985  
(202) 551-4678 telephone  
(202) 772-9245 facsimile  
[fitzpatrickbr@sec.gov](mailto:fitzpatrickbr@sec.gov)

**CERTIFICATE OF SERVICE**

I certify that on January 13, 2016, I electronically filed the foregoing NOTICE OF MOTION BY BRIDGET M. FITZPATRICK FOR ADMISSION PRO HAC VICE using the CM/ECF system, which will send notification of such filing to counsel for Defendants Caledonian Bank Ltd., Caledonian Securities Ltd. and Vermont Capital, S.A. at the following addresses:

Robert J.A. Zito  
Carter Ledyard Milburn LLP  
Two Wall Street  
New York, New York 10005  
[zito@clm.com](mailto:zito@clm.com)  
Attorneys for Defendant  
Vermont Capital, S.A.

Sigal P. Mandelker  
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Eleven Times Square  
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[mdale@proskauer.com](mailto:mdale@proskauer.com)  
Attorneys for Defendants Caledonian  
Bank Ltd. and Caledonian Securities  
Ltd.

/s/ Bridget M. Fitzpatrick  
Bridget M. Fitzpatrick

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**[PROPOSED] ORDER FOR ADMISSION PRO HAC VICE  
FOR BRIDGET M. FITZPATRICK**

The motion of Bridget M. Fitzpatrick for admission to practice Pro Hac Vice in the above captioned action is granted.

Applicant has declared she is a member in good standing of the bars of the District of Columbia and the State of California (inactive); and that her contact information is as follows:

Bridget M. Fitzpatrick  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549  
(202) 551-4678 telephone  
(202) 772-9245 facsimile  
[fitzpatrickbr@sec.gov](mailto:fitzpatrickbr@sec.gov)

Applicant having requested admission Pro Hac Vice to appear for all purposes as counsel for Plaintiff Securities and Exchange Commission in the above entitled action;

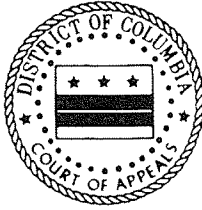
**IT IS HEREBY ORDERED** that Applicant is admitted to practice Pro Hac Vice in the above captioned case in the United States District Court for the Southern District of New York.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: New York, New York  
January \_\_\_\_, 2016

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HON. WILLIAM H. PAULEY III  
UNITED STATES DISTRICT JUDGE



District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D. C. 20001  
202 / 879-2710

*I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that*

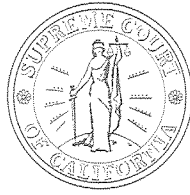
***BRIDGET M. FITZPATRICK***

*was on NOVEMBER 2, 2001 duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.*

*In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on NOVEMBER 6, 2015.*

JULIO A. CASTILLO  
Clerk of the Court

By: *Monette Lane*  
Deputy Clerk



## Supreme Court of California

FRANK A. McGUIRE  
*Court Administrator and Clerk of the Supreme Court*

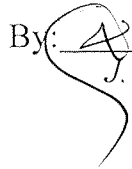
**CERTIFICATE OF THE CLERK OF THE SUPREME COURT**  
**OF THE**  
**STATE OF CALIFORNIA**

**BRIDGET MONICA FITZPATRICK**

*I, FRANK A. McGUIRE, Clerk of the Supreme Court of the State of California, do hereby certify that BRIDGET MONICA FITZPATRICK, #212525, was on the 15th day of February, 2001, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Inactive Members of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 7th day of December, 2015.*

FRANK A. McGUIRE  
*Clerk of the Supreme Court*

By:  \_\_\_\_\_  
*J. Hunter, Senior Deputy Clerk*